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Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

In the Matter of:

Amendment of Section 73.606(b),
 Table of Allotments,
 TV Broadcast Stations.
 (Galesburg, Illinois)

)
)
) MM Docket No.
) RM No.
)
)

To: Chief, Allocations Branch
 Policy and Rules Division
 Mass Media Bureau

PETITION FOR RULEMAKING

Northwest Television, Inc. ("Northwest"), applicant for a permit to construct a new full-service NTSC television station on Channel 67 at Galesburg, Illinois (File No. BPCT-951215KK), by its attorneys and pursuant to Public Notices DA 99-2605 and DA 00-536, hereby petitions the Commission to amend Section 73.606(b), TV Table of Allotments, of the Commission's Rules & Regulations, to substitute analog Channel 53 for analog Channel 67 at Galesburg, as set forth and for the reasons specified below:

<i>Community</i>	<i>Present</i>	<i>Channel No.</i> <i>Proposed</i>
Galesburg, Illinois	67	53

No. of Copies rec'd 0+4
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MMB

As demonstrated in the attached Engineering Statement and accompanying exhibit, the proposed change satisfies all applicable coverage, separations, and interference protection requirements.

Northwest is one of four mutually-exclusive applicants for the existing Galesburg TV allocation. The other applicants include DM Partners (File No. BPCT-961001XU), Galesburg 67, LLC (File No. BPCT-960930KS), and Highlands Broadcasting, Inc. (File No. BPCT-960919KT). Simultaneously with the submission of this Petition, a Joint Request for Universal Settlement of the Galesburg proceeding, which contemplates Northwest as the surviving applicant and where the parties specifically support this Petition and agree to amend their applications consistent with the requested channel substitution, is being filed with the Commission.

This petition is being filed in accordance with the requirement that entities with pending applications for new full-service NTSC television stations on Channels 60 through 69 seek a new channel below Channel 60. Favorable action on this Petition would serve the public interest by continuing to provide for a previously allocated new television service to residents of Galesburg and surrounding areas, by means of substituting Channel 53 for 67, while providing interference protection both to DTV and other NTSC services.

If Channel 53 is assigned to the TV Table of Allotments at Galesburg, Illinois, Northwest will modify its pending application to specify operation on the new channel and, if its application is granted, will promptly construct television facilities as authorized. Moreover, the separate Settlement Agreements executed by Northwest and each of the other settling parties, respectively, expressly

provide as follow: "[The other settling party] agrees to support the petition for rulemaking...to specify replacement Channel 53 and, if the rulemaking is approved prior to the grant of the construction permit to Northwest, will amend its application to specify replacement Channel 53."

Accordingly, it is respectfully requested that the Commission grant this Petition and issue a Notice of Proposed Rulemaking to amend Section 73.606(b) of the Rules as described above.

Respectfully submitted,

NORTHWEST TELEVISION, INC.

By: Anne Thomas Paxson
George R. Borsari, Jr.
Anne Thomas Paxson

Its Attorneys

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2021 L Street, N.W.,
Suite 402
Washington, DC 20036
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July 17, 2000

**ENGINEERING STATEMENT IN
SUPPORT OF PETITION
FOR RULEMAKING
ANALOG CHANNEL 53 - GALESBURG, IL
Northwest Television, Inc.
Galesburg, IL**

July 12, 2000

**Prepared For: Mr. Bruce Fox
Northwest Television, Inc.
100 Gillespie Drive
#12302
Franklin, TN 37067**

CARL E. SMITH CONSULTING ENGINEERS

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ENGINEERING AFFIDAVIT

State of Ohio)
) ss:
County of Summit)

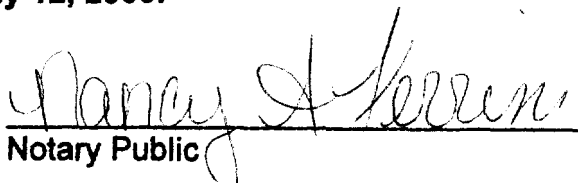
Roy P. Stype, III, being duly sworn, deposes and states that he is a graduate Electrical Engineer, a qualified and experienced Communications Consulting Engineer whose works are a matter of record with the Federal Communications Commission and that he is a member of the Firm of "Carl E. Smith Consulting Engineers" located at 2324 North Cleveland-Massillon Road in the Township of Bath, County of Summit, State of Ohio, and that the Firm has been retained by Northwest Television, Inc. to prepare the attached "Engineering Statement In Support of Petition for Rulemaking - Analog Channel 53 - Galesburg, IL."

The deponent states that the Exhibit was prepared by him or under his direction and is true of his own knowledge, except as to statements made on information and belief and as to such statements, he believes them to be true.



Roy P. Stype, III

Subscribed and sworn to before me on **July 12, 2000**.



Notary Public

NANCY A. FERRINI, Notary Public
Residence - Cuyahoga County
State Wide Jurisdiction, Ohio
My Commission Expires March 13, 2005

/SEAL/

ENGINEERING STATEMENT

1.0 GENERAL

This engineering statement is prepared on behalf of Northwest Television, Inc., applicant (BPCT-951215KK) for a construction permit for a new analog TV station on Channel 67 in Galesburg, Illinois. The Report and Order in ET Docket 97-157 reallocated the spectrum which constitutes TV Channels 60 through 69 to the fixed and mobile services. As part of this spectrum reallocation, the FCC indicated that they would immediately discontinue processing any pending applications for new analog TV stations in this frequency range, but would provide an opportunity at a later date for applicants for channels in this frequency range to submit rulemaking petitions to substitute a channel below Channel 60 for the presently allotted channel for which they have applied. On November 22, 1999, the FCC released a Public Notice announcing a window for the filing of such rulemaking petitions, running through March 17, 2000. By Public Notice dated March 9, 2000, this filing window was subsequently extended through July 15, 2000. This engineering statement supports such a rulemaking petition and proposes to substitute analog Channel 53 for the present analog Channel 67 allotment in Galesburg. The grant of this proposed channel substitution in Galesburg would permit the processing of the above referenced application to continue, thus permitting the activation of the only television channel allotted to Galesburg.

Section 2.0 of this engineering statement contains complete details regarding the proposed Channel 53 operating facilities. It also documents that these proposed operating facilities would provide the required city grade coverage to Galesburg. Section 3.0 of this engineering statement documents that the proposed facilities will provide the required protection to all other analog TV facilities requiring protection consideration.

Similarly, Section 4.0 of this engineering statement provides the necessary documentation to show that the proposed facilities provide the required protection to all DTV facilities requiring protection consideration. Finally, Section 5.0 of this engineering statement documents that the proposed facilities provide the necessary protection to all LPTV stations requiring protection consideration which have filed Certificates of Eligibility for Class A TV status.

Based on the data contained in this engineering statement, Channel 53 can be substituted for Channel 67 in Galesburg, Illinois utilizing the operating facilities outlined in Section 2.0 of this engineering statement while meeting the protection requirements to all other facilities requiring protection consideration, thus permitting the activation of the only TV channel allotted to Galesburg.

2.0 PROPOSED OPERATING FACILITIES

The proposed reference site for Channel 53 is located 40.5 kilometers north of Galesburg at the following geographic coordinates:

NL - 41° 18' 45"

WL - 90° 22' 45"

The proposed operation from this site would employ a maximum peak visual effective radiated power of 4800 kilowatts at 335.5 meters above average terrain utilizing a directional antenna. Table 2.0 presents a complete tabulation of the pertinent technical parameters for these proposed operating facilities. Table 2.1 presents a tabulation of the proposed directional radiation pattern, while Figure 2.1 presents a plot of this proposed radiation pattern in polar form.

Figure 2.2 is a map exhibit depicting the predicted service contours for these proposed operating facilities in relation to the Galesburg city limits. These contours were projected as outlined in Section 73.684 of the FCC Rules utilizing the proposed operating facilities outlined in Table 2.0, the directional pattern specified in Table 2.1, and terrain data from the NGDC 30 second terrain database. As shown in this figure, the proposed 80 dBu (City Grade) contour will encompass all of Galesburg, as required by Section 73.685(a) of the FCC Rules.

TABLE 2.0

PROPOSED OPERATING FACILITIES
CHANNEL 53 - GALESBURG, IL
Northwest Television, Inc.
Galesburg, IL

Power:	4800 kw (36.8dBk) directional
Proposed Antenna:	Dielectric TFU-33ETT-R T200 Main Lobes: 100°, 220°, and 340° (See Table 2.1 and Figure 2.1 for pattern data)
Antenna Height:	1074' (327.4m) AGL 1829' (557.5m) MSL 1101' (335.5m) AAT
Site Coordinates (NAD27):	NL - 41° 18' 45" WL - 90° 22' 45"

TABULATION OF AZIMUTH PATTERN

Azimuth Pattern Drawing # T200

Angle	Field	ERP (kW)	ERP (dBk)
0	0.826	3275	35.15
10	0.657	2072	33.16
20	0.499	1195	30.77
30	0.398	760	28.81
40	0.366	643	28.08
50	0.398	760	28.81
60	0.499	1195	30.77
70	0.657	2072	33.16
80	0.826	3275	35.15
90	0.953	4359	36.39
100	1.000	4800	36.81
110	0.953	4359	36.39
120	0.826	3275	35.15
130	0.657	2072	33.16
140	0.499	1195	30.77
150	0.398	760	28.81
160	0.366	643	28.08
170	0.398	760	28.81
180	0.499	1195	30.77
190	0.657	2072	33.16
200	0.826	3275	35.15
210	0.953	4359	36.39
220	1.000	4800	36.81
230	0.953	4359	36.39
240	0.826	3275	35.15
250	0.657	2072	33.16
260	0.499	1195	30.77
270	0.398	760	28.81
280	0.366	643	28.08
290	0.398	760	28.81
300	0.499	1195	30.77
310	0.657	2072	33.16
320	0.826	3275	35.15
330	0.953	4359	36.39
340	1.000	4800	36.81
350	0.953	4359	36.39

Maxima

Angle	Field	ERP (kW)	ERP (dBk)
100	1.000	4800	36.81
220	1.000	4800	36.81
340	1.000	4800	36.81

Minima

Angle	Field	ERP (kW)	ERP (dBk)
40	0.366	643	28.08
160	0.366	643	28.08
280	0.366	643	28.08

TABLE 2.1

PROPOSED DIRECTIONAL PATTERN
 CHANNEL 53 - GALESBURG, IL

Northwest Television, Inc.
 Galesburg, IL

AZIMUTH PATTERN

RMS Gain at Main Lobe
Calculated / Measured

2.00 (3.01 dB)
Calculated

Frequency
Drawing #

707 MHz
T200

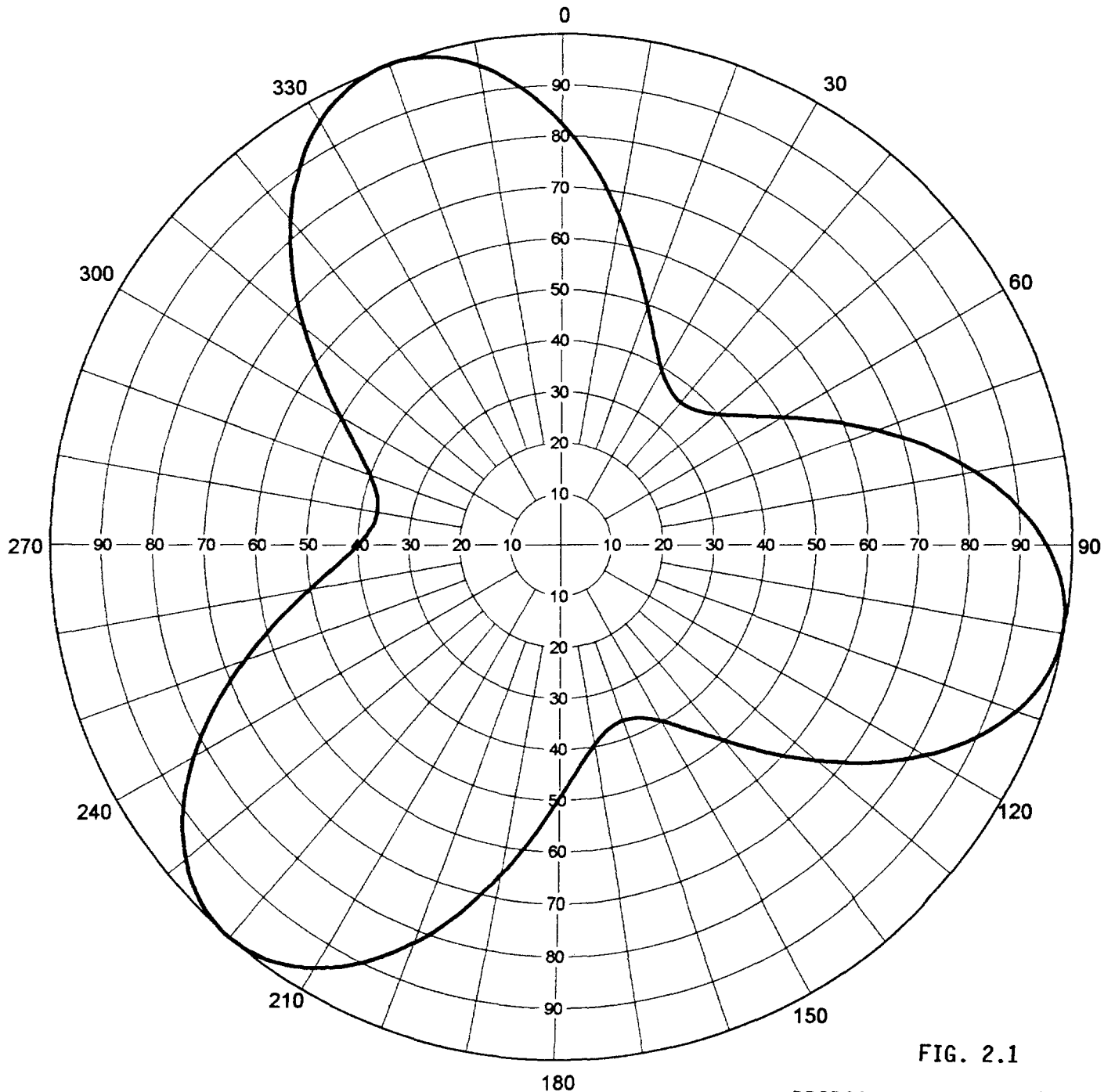
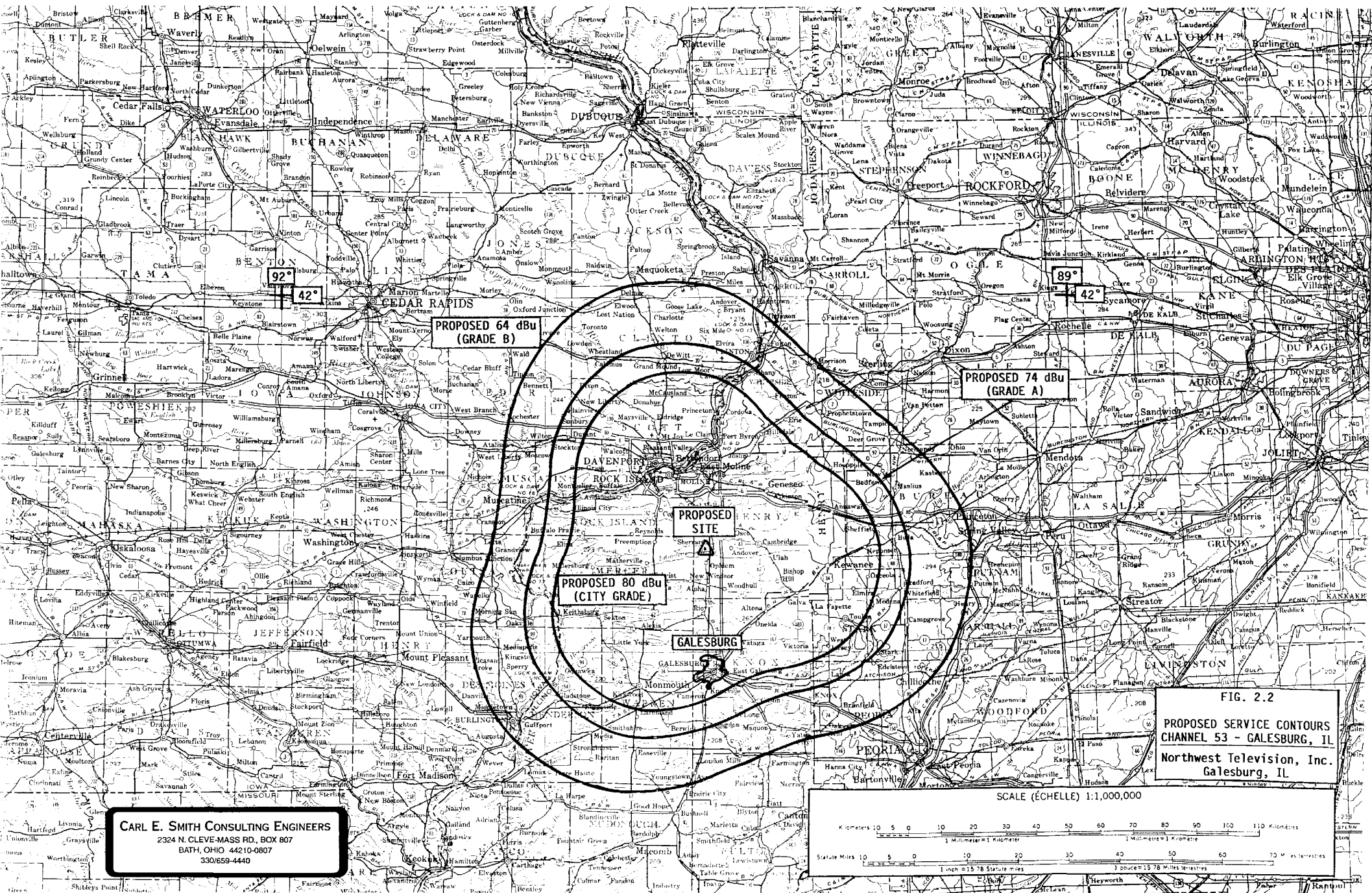


FIG. 2.1

PROPOSED DIRECTIONAL PATTERN
CHANNEL 53 - GALESBURG, IL
Northwest Television, Inc.
Galesburg, IL



CARL E. SMITH CONSULTING ENGINEERS
2324 N. CLEVELAND RD., BOX 807
BATH, OHIO 44210-0807
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3.0 ANALOG TV PROTECTION

Table 3.0 is a TV spacing study outlining the actual and required spacings between the proposed analog Channel 53 facilities and all present and proposed analog TV facilities requiring protection consideration. As shown in this table, the proposed facilities would be short spaced to the present Channel 67 allotment in Galesburg, as well as four pending applications for this allotment, and also to vacant analog allotments on Channel 38 in Fort Madison, Iowa and Channel 53 in Pontiac, Illinois.

The short spacing to the vacant allotment and pending applications for Channel 67 in Galesburg should pose no problems, as this channel will be deleted if Channel 53 is allotted to Galesburg, as proposed herein, also requiring the amendment of any pending applications for this allotment to specify operation on Channel 53. No construction permit applications were filed for either Channel 38 in Fort Madison, Iowa or Channel 53 in Pontiac, Illinois prior to the September 26, 1996 deadline for filing applications for new analog TV stations. Thus, although the analog Table of Allotments has not been formally modified to delete these allotments, pursuant to Footnote 192 of the Sixth Report and Order in MM Docket 87-268, these allotments will be treated as if they have been deleted for the sake of evaluating proposals such as that outlined herein pending the issuance of a formal deletion order at a future date. Accordingly, the short spacings to these two vacant allotments should not pose an impediment to the grant of the attached rulemaking petition.

Based on the above information, the proposed Channel 53 analog facilities comply with the necessary spacing requirements to all other analog TV facilities requiring protection consideration.

TABLE 3.0

**NTSC TV SPACING STUDY
CHANNEL 53 - GALESBURG, IL**

Northwest Television, Inc.
Galesburg, IL

<u>Station</u>	<u>Location</u>	<u>Channel</u>	<u>Zone</u>	<u>Spacing (km)</u>	<u>Required Spacing (km)</u>
Allotment ^{1,2,3}	Fort Madison, IA	38	II	109.34	119.9
WQRF-TV	Rockford, IL	39	I	148.31	95.7
Allotment ^{1,3}	Richland Center, WI	45	II	225.40	31.4
Allotment ^{1,3}	Kieler, WI	46	II	142.34	95.7
KPXR	Cedar Rapids, IA	48	II	165.33	31.4
Allotment ^{1,3}	Bloomington, WI	49	II	180.48	31.4
WPWR-TV	Gary, IN	50	I	237.20	31.4
Allotment ^{1,3}	Highland, WI	51	II	192.53	31.4
WWRS-TV	Mayville, WI	52	I	280.99	87.7
WWRS-TV ⁴	Mayville, WI	52	I	280.99	87.7
Allotment ^{1,2,3}	Pontiac, IL	53	I	136.91	248.6
Allotment ^{1,3}	Keosauqua, IA	54	II	148.12	87.7
WRSP-TV	Springfield, IL	55	I	185.74	31.4
WYIN	Gary, IN	56	I	249.39	31.4
Allotment ^{1,3}	Burlington, IA	57	II	82.59	31.4
WDJT-TV	Milwaukee, WI	58	I	284.29	31.4
WEHS-TV	Aurora, IL	60	I	237.20	95.7
WEHS-TV ⁴	Aurora, IL	60	I	237.20	95.7
960930KS ^{2,5,6}	Galesburg, IL	67	I	0.06	95.7
960919KT ^{2,5,6}	Galesburg, IL	67	I	29.11	95.7
Allotment ^{1,2,6}	Galesburg, IL	67	I	40.37	95.7
961001XU ^{2,5,6}	Galesburg, IL	67	I	56.52	95.7
951215KK ^{2,5,6}	Galesburg, IL	67	I	67.44	95.7
960723LB ⁵	Danville, IL	68	I	250.98	119.9

TABLE 3.0 (cont'd)

NOTES:

¹Vacant allotment

²Short Spaced

³This allotment considered to be deleted pursuant to the Sixth Report and Order in
MM Docket 87-268

⁴Construction permit

⁵Pending application

⁶The deletion of this allotment is proposed in this rulemaking petition

4.0 DTV PROTECTION

Studies were conducted utilizing the procedures outlined in FCC OET Bulletin 69 to evaluate the predicted increase in interference to DTV facilities requiring protection consideration from the Channel 53 analog facilities proposed herein. These interference studies were conducted utilizing the FCC's "FLR" computer program modified to run on a Windows 98/Windows NT platform and recompiled under the Compaq (DEC) Visual Fortran compiler. The version of the "FLR" program utilized in conducting these studies employed the same 2 kilometer cell size as was employed by the FCC in conducting the initial DTV allotment studies. This implementation of the "FLR" program was run for several stations utilizing the databases employed by the FCC to generate the benchmark values contained in Appendix B of the December 18, 1998 Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders and yielded results essentially identical to those found in Appendix B for these stations. Thus, it is felt that this implementation of the "FLR" program faithfully reproduces the results obtained by the FCC in their implementation of this program.

These interference studies were conducted on all DTV facilities for which the proposed site is located within the distances outlined in Table 7 of OET Bulletin 69 of the Noise Limited contour. The allotment facilities were studied for all DTV facilities. Further studies were also conducted to the proposed or authorized facilities of DTV stations whose application or authorization specifies facilities exceeding those authorized by their DTV allotment (non-checklist facilities).

In conducting these interference studies, interfering NTSC stations holding a construction permit were considered to be operating with their construction permit facilities, while interfering NTSC stations not holding a construction permit were considered to be

operating with their licensed facilities. Interfering DTV facilities who have not yet filed a construction permit application and authorized or proposed interfering DTV facilities which are based on a checklist application were considered to be operating with their DTV allotment facilities. For interfering DTV facilities which have a pending maximization application or have been authorized operating facilities based on a maximization application, the maximized facilities were considered in these studies only if they reduced the DTV Service population for the station being studied below the value which occurs when the same station's DTV allotment facilities are considered.

These studies were conducted to evaluate the impact of the proposed Channel 53 operating facilities on five DTV stations:

KCRG-DT	Cedar Rapids, IA	Channel 52
WGBO-DT	Joliet, IL	Channel 53
WCFN-DT	Springfield, IL	Channel 53
WKBT-DT	La Crosse, WI	Channel 53
WGEM-DT	Quincy, IL	Channel 54

The results of these studies are tabulated in Tables 4.0 through 4.7. These tables contain a complete listing of the stations which were included in each study and the facilities which were considered for each station included in the study. They also contain the output of the "FLR" program for the station being studied, both with and without the Channel 53 analog facilities proposed herein.

As shown by this data, the proposed Channel 53 analog facilities would result in additional interference to each set of facilities which was studied for four of the DTV stations on which OET 69 interference studies were conducted:

KCRG-DT	Cedar Rapids, IA	Channel 52
WGBO-DT	Joliet, IL	Channel 53
WCFN-DT	Springfield, IL	Channel 53
WKBT-DT	La Crosse, WI	Channel 53

The additional predicted interference to each of these stations, however, is less than 0.49% of the benchmark population value for the appropriate station as extracted from Appendix B of the Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268. Thus, when rounded to the nearest 1%, pursuant to the procedures outlined in the FCC's August 10, 1998 Public Notice detailing the procedures to be employed in conducting this type of interference studies, the predicted interference to these DTV facilities becomes 0%, and is not cognizable.

Based on the above information, the proposed Channel 53 analog operating facilities fully comply with the protection requirements to all DTV facilities requiring protection consideration.

TABLE 4.0

OET 69 INTERFERENCE STUDIES

KCRG-DT - CEDAR RAPIDS, IA

(ALLOTMENT FACILITIES)

Northwest Television, Inc.

Galesburg, IL

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
KCRG-DT	Cedar Rapids, IA	52	DTV	Allotment	

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WWRS-TV	Mayville, WI	52	NTSC	CP	BPCT-19990331KN
KGAN-DT	Cedar Rapids, IA	51	DTV	Allotment	
WLS-DT	Chicago, IL	52	DTV	Allotment	
WKBT-DT	La Crosse, WI	53	DTV	Allotment	
NEW	Galesburg, IL	53	NTSC	Applicant	

STUDY RESULTS WITHOUT PROPOSED GALESBURG FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	946742	43967.6
not affected by terrain losses	921968	43221.6
lost to NTSC IX	0	0.0
lost to additional IX by ATV	429	68.5
lost to ATV IX only	429	68.5
lost to all IX	429	68.5

STUDY RESULTS INCLUDING PROPOSED GALESBURG FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	946742	43967.6
not affected by terrain losses	921968	43221.6
lost to NTSC IX	839	12.1
lost to additional IX by ATV	429	68.5
lost to ATV IX only	429	68.5
lost to all IX	1268	80.6

TABLE 4.0(cont'd)

OET 69 INTERFERENCE STUDIES
KCRG-DT - CEDAR RAPIDS, IA
(ALLOTMENT FACILITIES)

SUMMARY OF STUDY RESULTS

	<u>Without Galesburg</u>	<u>With Proposed Galesburg</u>	<u>Increase/(Decrease)</u>
DTV Service	921,539	920,700	(839)
Percent Loss(Gain)*	2.79%	2.88%	0.09%

*Percent Loss calculations are based on the benchmark DTV Service value of 948,000 from Appendix B of the December 18, 1998 Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268.

TABLE 4.1

OET 69 INTERFERENCE STUDIES

WGBO-DT - JOLIET, IL

(ALLOTMENT FACILITIES)

Northwest Television, Inc.

Galesburg, IL

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WGBO-DT	Joliet, IL	53	DTV	Allotment	

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WGVK	Kalamazoo, MI	52	NTSC	Licensed	BLET-19841012KH
WLAJ	Lansing, MI	53	NTSC	CP	BPCT-19960528KG
WWRS-TV	Mayville, WI	52	NTSC	CP	BPCT-19990331KN
WLS-DT	Chicago, IL	52	DTV	Allotment	
WREX-DT	Rockford, IL	54	DTV	Allotment	
WCFN-DT	Springfield, IL	53	DTV	Application	BPCDT-19991026ABC
WTTV-DT	Bloomington, IN	53	DTV	Allotment	
NEW	Galesburg, IL	53	NTSC	Applicant	

STUDY RESULTS WITHOUT PROPOSED GALESBURG FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	8003924	17816.5
not affected by terrain losses	8003924	17816.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	96742	1702.5
lost to ATV IX only	96742	1702.5
lost to all IX	96742	1702.5

STUDY RESULTS INCLUDING PROPOSED GALESBURG FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	8003924	17816.5
not affected by terrain losses	8003924	17816.5
lost to NTSC IX	709	36.1
lost to additional IX by ATV	96441	1678.5
lost to ATV IX only	96742	1702.5
lost to all IX	97150	1714.6

TABLE 4.1(cont'd)

OET 69 INTERFERENCE STUDIES
 WGBO-DT - JOLIET, IL
(ALLOTMENT FACILITIES)

SUMMARY OF STUDY RESULTS

	<u>Without Galesburg</u>	<u>With Proposed Galesburg</u>	<u>Increase/(Decrease)</u>
DTV Service	7,907,182	7,906,774	(408)
Percent Loss(Gain)*	1.28%	1.29%	0.01%

*Percent Loss calculations are based on the benchmark NTSC Service value of 8,010,000 from Appendix B of the December 18, 1998 Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268.

TABLE 4.2

OET 69 INTERFERENCE STUDIES

WGBO-DT - JOLIET, IL

(APPLICATION FACILITIES)

Northwest Television, Inc.

Galesburg, IL

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WGBO-DT	Joliet, IL	53	DTV	Application	BPCDT-19991029AHU

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WGVK	Kalamazoo, MI	52	NTSC	Licensed	BLET-19841012KH
WLAJ	Lansing, MI	53	NTSC	CP	BPCT-19960528KG
WTLJ	Muskegon, MI	54	NTSC	Licensed	BLCT-19861110KI
WWRS-TV	Mayville, WI	52	NTSC	CP	BPCT-19990331KN
WLS-DT	Chicago, IL	52	DTV	Allotment	
WREX-DT	Rockford, IL	54	DTV	Allotment	
WCFN-DT	Springfield, IL	53	DTV	Application	BPCDT-19991026ABC
WTTV-DT	Bloomington, IN	53	DTV	Allotment	
WKBT-DT	La Crosse, WI	53	DTV	Allotment	
NEW	Galesburg, IL	53	NTSC	Applicant	

STUDY RESULTS WITHOUT PROPOSED GALESBURG FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	8103344	20288.4
not affected by terrain losses	8102786	20280.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	41664	807.0
lost to ATV IX only	41664	807.0
lost to all IX	41664	807.0

TABLE 4.2(cont'd)

OET 69 INTERFERENCE STUDIES
WGBO-DT - JOLIET, IL
(APPLICATION FACILITIES)

STUDY RESULTS INCLUDING PROPOSED GALESBURG FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	8103344	20288.4
not affected by terrain losses	8102786	20280.4
lost to NTSC IX	2067	36.1
lost to additional IX by ATV	40233	782.9
lost to ATV IX only	41664	807.0
lost to all IX	42300	819.1

SUMMARY OF STUDY RESULTS

	<u>Without Galesburg</u>	<u>With Proposed Galesburg</u>	<u>Increase/(Decrease)</u>
DTV Service	8,061,122	8,060,486	(636)
Percent Loss(Gain)*	(0.64)%	(0.63)%	0.01%

*Percent Loss calculations are based on the benchmark NTSC Service value of 8,010,000 from Appendix B of the December 18, 1998 Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268.

TABLE 4.3

OET 69 INTERFERENCE STUDIES
 WCFN-DT - SPRINGFIELD, IL
(ALLOTMENT FACILITIES)

Northwest Television, Inc.
 Galesburg, IL

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WCFN-DT	Springfield, IL	53	DTV	Allotment	

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WGBO-DT	Joliet, IL	53	DTV	Allotment	
WGEM-DT	Quincy, IL	54	DTV	Allotment	
WTTV-DT	Bloomington, IN	53	DTV	Allotment	
NEW	Galesburg, IL	53	NTSC	Applicant	

STUDY RESULTS WITHOUT PROPOSED GALESBURG FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	352042	9972.1
not affected by terrain losses	352033	9968.1
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0

STUDY RESULTS INCLUDING PROPOSED GALESBURG FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	352042	9972.1
not affected by terrain losses	352033	9968.1
lost to NTSC IX	404	44.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	404	44.0

TABLE 4.3(cont'd)

OET 69 INTERFERENCE STUDIES
WCFN-DT - SPRINGFIELD, IL
(ALLOTMENT FACILITIES)

SUMMARY OF STUDY RESULTS

	<u>Without Galesburg</u>	<u>With Proposed Galesburg</u>	<u>Increase/(Decrease)</u>
DTV Service	352,033	351,629	(404)
Percent Loss(Gain)*	(54.40)%	(54.22)%	0.18%

*Percent Loss calculations are based on the benchmark DTV Service value of 228,000 from Appendix B of the December 18, 1998 Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268.

TABLE 4.4

OET 69 INTERFERENCE STUDIES

WCFN-DT - SPRINGFIELD, IL

(APPLICATION FACILITIES)

Northwest Television, Inc.

Galesburg, IL

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WCFN-DT	Springfield, IL	53	DTV	Application	BPCDT-19991026ABC

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WGBO-DT	Joliet, IL	53	DTV	Allotment	
WGEM-DT	Quincy, IL	54	DTV	Allotment	
WTTV-DT	Bloomington, IN	53	DTV	Allotment	
NEW	Galesburg, IL	53	NTSC	Applicant	

STUDY RESULTS WITHOUT PROPOSED GALESBURG FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	519535	18212.9
not affected by terrain losses	519460	18172.9
lost to NTSC IX	0	0.0
lost to additional IX by ATV	186	8.0
lost to ATV IX only	186	8.0
lost to all IX	186	8.0

STUDY RESULTS INCLUDING PROPOSED GALESBURG FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	519535	18212.9
not affected by terrain losses	519460	18172.9
lost to NTSC IX	414	44.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	186	8.0
lost to all IX	414	44.0

TABLE 4.4(cont'd)

OET 69 INTERFERENCE STUDIES
WCFN-DT - SPRINGFIELD, IL
(APPLICATION FACILITIES)

SUMMARY OF STUDY RESULTS

	<u>Without</u> <u>Galesburg</u>	<u>With Proposed</u> <u>Galesburg</u>	<u>Increase/(Decrease)</u>
DTV Service	519,274	519,046	(228)
Percent Loss(Gain)*	(127.75)%	(127.65)%	0.10%

*Percent Loss calculations are based on the benchmark DTV Service value of 228,000 from Appendix B of the December 18, 1998 Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268.

TABLE 4.5

OET 69 INTERFERENCE STUDIES

WKBT-DT - LA CROSSE, WI

(ALLOTMENT FACILITIES)

Northwest Television, Inc.

Galesburg, IL

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WKBT-DT	La Crosse, WI	53	DTV	Allotment	

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
KCRG-DT	Cedar Rapids, IA	52	DTV	Allotment	
WGBO-DT	Joliet, IL	53	DTV	Allotment	
NEW	Galesburg, IL	53	NTSC	Applicant	

STUDY RESULTS WITHOUT PROPOSED GALESBURG FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	701339	37666.9
not affected by terrain losses	669561	36492.9
lost to NTSC IX	0	0.0
lost to additional IX by ATV	1305	44.1
lost to ATV IX only	1305	44.1
lost to all IX	1305	44.1

STUDY RESULTS INCLUDING PROPOSED GALESBURG FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	701339	37666.9
not affected by terrain losses	669561	36492.9
lost to NTSC IX	3056	272.5
lost to additional IX by ATV	132	12.0
lost to ATV IX only	1305	44.1
lost to all IX	3188	284.5

TABLE 4.5(cont'd)

OET 69 INTERFERENCE STUDIES
WKBT-DT - LA CROSSE, WI
(ALLOTMENT FACILITIES)

SUMMARY OF STUDY RESULTS

	<u>Without Galesburg</u>	<u>With Proposed Galesburg</u>	<u>Increase/(Decrease)</u>
DTV Service	668,256	666,373	(1,883)
Percent Loss(Gain)*	1.87%	2.15%	0.28%

*Percent Loss calculations are based on the benchmark DTV Service value of 681,000 from Appendix B of the December 18, 1998 Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268.

TABLE 4.6

OET 69 INTERFERENCE STUDIES

WGEM-DT - QUINCY, IL

(ALLOTMENT FACILITIES)

Northwest Television, Inc.

Galesburg, IL

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WGEM-DT	Quincy, IL	54	DTV	Allotment	

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WRSP-TV	Springfield, IL	55	NTSC	Licensed	BLCT-19840425KH
WREX-DT	Rockford, IL	54	DTV	Allotment	
WCFN-DT	Springfield, IL	53	DTV	Application	BPCDT-19991026ABC
NEW	Galesburg, IL	53	NTSC	Applicant	

STUDY RESULTS WITHOUT PROPOSED GALESBURG FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	290391	22672.8
not affected by terrain losses	290193	22597.0
lost to NTSC IX	0	0.0
lost to additional IX by ATV	94	12.0
lost to ATV IX only	94	12.0
lost to all IX	94	12.0

STUDY RESULTS INCLUDING PROPOSED GALESBURG FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	290391	22672.8
not affected by terrain losses	290193	22597.0
lost to NTSC IX	0	0.0
lost to additional IX by ATV	94	12.0
lost to ATV IX only	94	12.0
lost to all IX	94	12.0

TABLE 4.6(cont'd)

OET 69 INTERFERENCE STUDIES
WGEM-DT - QUINCY, IL
(ALLOTMENT FACILITIES)

SUMMARY OF STUDY RESULTS

	<u>Without Galesburg</u>	<u>With Proposed Galesburg</u>	<u>Increase/(Decrease)</u>
DTV Service	290,099	290,099	0
Percent Loss(Gain)*	7.32%	7.32%	0.00%

*Percent Loss calculations are based on the benchmark DTV Service value of 313,000 from Appendix B of the December 18, 1998 Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268.

TABLE 4.7

OET 69 INTERFERENCE STUDIES

WGEM-DT - QUINCY, IL

(APPLICATION FACILITIES)

Northwest Television, Inc.

Galesburg, IL

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WGEM-DT	Quincy, IL	54	DTV	Application	BPCDT-19991101AHX

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WRSP-TV	Springfield, IL	55	NTSC	Licensed	BLCT-19840425KH
WREX-DT	Rockford, IL	54	DTV	Allotment	
WCFN-DT	Springfield, IL	53	DTV	Application	BPCDT-19991026ABC
NEW	Galesburg, IL	53	NTSC	Applicant	

STUDY RESULTS WITHOUT PROPOSED GALESBURG FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	279745	21012.3
not affected by terrain losses	277836	20896.6
lost to NTSC IX	29	4.0
lost to additional IX by ATV	2	12.0
lost to ATV IX only	2	12.0
lost to all IX	31	16.0

STUDY RESULTS INCLUDING PROPOSED GALESBURG FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	279745	21012.3
not affected by terrain losses	277836	20896.6
lost to NTSC IX	29	4.0
lost to additional IX by ATV	2	12.0
lost to ATV IX only	2	12.0
lost to all IX	31	16.0

TABLE 4.7(cont'd)

OET 69 INTERFERENCE STUDIES
WGEM-DT - QUINCY, IL
(APPLICATION FACILITIES)

SUMMARY OF STUDY RESULTS

	<u>Without Galesburg</u>	<u>With Proposed Galesburg</u>	<u>Increase/(Decrease)</u>
DTV Service	277,805	277,805	0
Percent Loss(Gain)*	11.24%	11.24%	0.00%

*Percent Loss calculations are based on the benchmark DTV Service value of 313,000 from Appendix B of the December 18, 1998 Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268.

5.0 CLASS A TV PROTECTION

Pursuant to the Community Broadcasters Protection Act of 1999 ("CBPA") and the Report and Order in MM Docket 00-10, it is also necessary to provide protection to the authorized facilities of existing LPTV stations on Channels 2 through 51 which filed acceptable Certifications of Eligibility for Class A status by the January 28, 2000 deadline. No protection consideration need be given to stations on Channels 52 or higher who filed such certifications, as they will not be eligible to be awarded Class A status until such time as they have located a suitable core channel to which they can relocate and are not entitled to protection until such time as they are granted a construction permit for operation on a core channel.

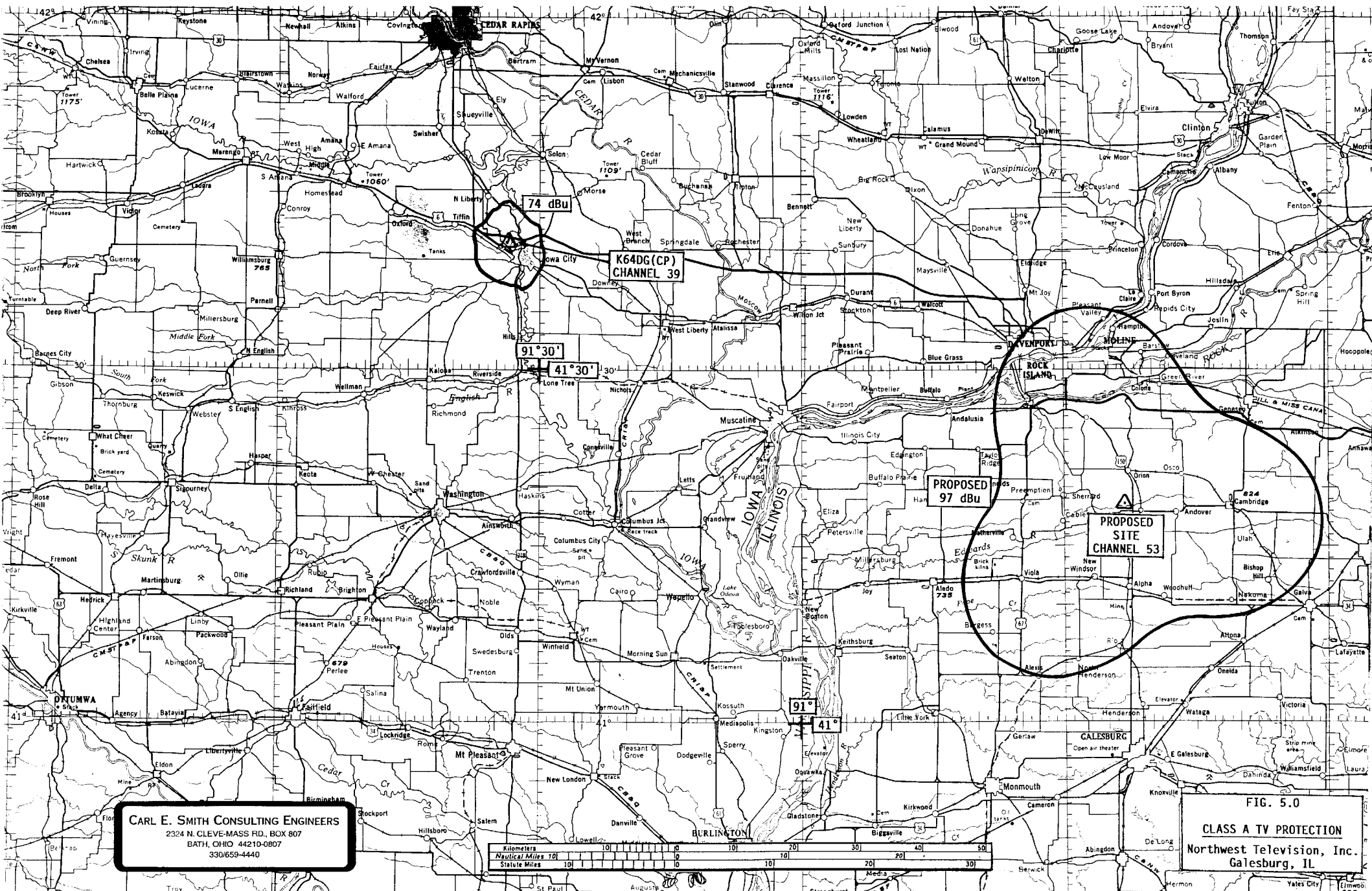
A review of the FCC's February 8, 2000 Public Notice listing the stations which filed Class A certifications found only one station operating below Channel 52 which requires protection consideration:

K64DG(CP) Iowa City, IA Channel 39

The K64DG Class A certification was found acceptable in an FCC Public Notice (DA00-1224) dated June 2, 2000, and, thus K64DG has been deemed eligible to file a Class A license application and is entitled to continued protection as a Class A TV facility.

The protection requirements to Class A TV stations are outlined in Section 73.613 of the FCC Rules. This Rule Section prohibits any overlap between the 97 dBu contour for the proposed Channel 53 facilities and the 74 dBu contour for the Channel 39 facilities authorized by the K64DG construction permit. Figure 5.0 is a map exhibit depicting the appropriate contours. The proposed 97 dBu contour was projected utilizing the proposed facilities specified in Section 2.0 of this engineering statement and terrain data extracted from the NGDC 30 second terrain database. The 74 dBu contour for the

K64DG construction permit facilities was projected utilizing the notified facilities, as extracted from the FCC's Consolidated Database System and terrain data extracted from the NGDC 30 second terrain database. As shown in this figure, there will be no prohibited contour overlap between these two facilities. Thus, the proposed Channel 53 analog facilities provide the required protection to the K64DG construction permit facilities.



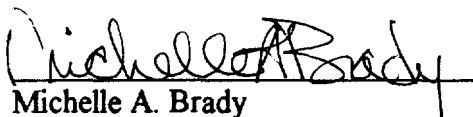
CERTIFICATE OF SERVICE

I, Michelle A Brady, an employee of the law firm Borsari & Paxson, hereby certify that a true copy of the foregoing Petition for Rulemaking was this 17th day of July 2000 sent, via first class United States mail, postage prepaid, to each of the following:

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